



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CPK
F. #2018RO1075/OCDETF#NY-NYE-841

*610 Federal Plaza
Central Islip, New York 11722*

February 7, 2019

BY ECF

The Honorable Joan M. Azrack
United States District Court Judge
United States District Court
Eastern District of New York
920 Federal Plaza
Central Islip, New York 11722

The Honorable Joseph F. Bianco
United States District Court Judge
United States District Court
Eastern District of New York
1040 Federal Plaza
Central Islip, New York 11722

Re: United States v. Nader Mohammad Farhat and Mahmoud Ali Barakat –
CR 18-292(JMA) and United States v. Enayatullah Khwaja, et.al. –
CR 18-607(JFB)

Dear Judge Azrack and Judge Bianco:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the above-captioned cases are presumptively related to each other.

Local Rule 50.3.2(b)(1) provides for a “presumption that one case is ‘related’ to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case.” Local Rule 50.3.2(c)(1) directs the United States Attorney’s Office to “give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1).”

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). These cases are presumptively related because the facts of the cases arise, in part, out of the same trade based money laundering scheme. Specifically, among other things, defendants Nader

Mohammed Farhat and Mahmoud Ali Barakat (CR 18-292) helped to orchestrate the trade based money laundering scheme together with defendants in the Enayatullah Khwaja case (CR 18-607) Bulk cash payments with illicit proceeds were often directed by defendants in Paraguay (Farhat and Barakat) for delivery to defendants in New York (Enayatullah Khwaja) using other defendants in the Enayatullah Khwaja case. As the cases are thus presumptively related, the government respectfully submits that reassignment would be appropriate, as it would likely result in a significant savings of judicial resources and serve the interests of justice.

Respectfully submitted,

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cc: Defense counsel
(on both cases, CR 18-292 & CR 18-607)